

## **EXHIBIT A**

Excerpts from the May 4, 2022 Deposition of Mr. Boykin

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION  
CIVIL ACTION NO. 3:21-cv-03302-JMC-TJH-RMG

THE SOUTH CAROLINA STATE )  
CONFERENCE OF THE NAACP, )

and )

TAIWAN SCOTT, on behalf of )  
himself and all other similarly )  
situated persons, )

Plaintiffs, )

v. )

HENRY D. MCMASTER, in his )  
official capacity as Governor )  
of South Carolina; THOMAS C. )  
ALEXANDER, in his official )  
capacity as President of the )  
Senate; LUKE A. RANKIN, in his )  
official capacity as Chairman )  
of the Senate Judiciary )  
Committee; JAMES H. LUCAS, in )  
his official capacity as Speaker )  
of the House of Representatives; )  
CHRIS MURPHY, in his official )  
capacity as Chairman of the )  
House of Representatives )  
Judiciary Committee; WALLACE )  
H. JORDAN, in his official )  
capacity as Chairman of the )  
House of Representatives )  
Elections Law Subcommittee; )  
HOWARD KNAPP, in his official )  
capacity as interim Executive )  
Director of the South Carolina )  
State Election Commission; JOHN )  
WELLS, Chair, JOANNE DAY, )  
CLIFFORD J. EDLER, LINDA MCCALL, )  
and SCOTT MOSELEY, in their )  
official capacities as members )  
of the South Carolina Election )  
Commission, )

Defendants. )

**DEPOSITION**

**OF**

**CHARLES J. BOYKIN, ESQ.**

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, the deposition of **Charles J. Boykin, Esquire**, (via Zoom) was taken by Counsel for Defendants James H. Lucas, Chris Murphy, and Wallace H. Jordan, at the hour of 10:03 a.m. on Wednesday, May 4, 2022, at the law offices of Nexsen Pruet, LLC, 1230 Main Street, Suite 700, Columbia, South Carolina, attended by counsel as follows:

**TIMMI A. PARRISH**  
**VERBATIM REPORTER**

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**WHITWORTH COURT REPORTING**

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1 A. I suppose I would have a belief if I knew what the  
2 question was.

3 Q. Okay. Did -- and you said you don't recall if you  
4 were at the meeting where the vote occurred and you  
5 don't recall if you voted for the litigation; is  
6 that correct?

7 A. That is correct.

8 Q. Okay. Are you generally aware of the claims being  
9 brought in this litigation?

10 A. I can't recite them off, you know, off the top of my  
11 head.

12 Q. Has anyone else talked to you about this litigation?

13 A. Talked to me about it? No.

14 (ZOOM INTERRUPTION)

15 **EXAMINATION RESUMED BY MR. PARENTE:**

16 Q. I'm sorry, Mr. Boykin. We're having internet  
17 issues, but it is still being record by audio, so we  
18 are still on the record. It's just the Zoom that's  
19 having an issue. But I can see and hear you fine,  
20 so we're going to keep going. When -- do you know  
21 of any evidence that was presented to the Executive  
22 Committee to support the allegations in this  
23 lawsuit?

24 A. I'm not aware.

25 Q. Okay. All right. I'm going to move on to a

1 House or the Senate?

2 A. I don't know the follow-up on these tasks.

3 Q. Okay. Okay. Where it says -- look at -- or, I'm  
4 sorry -- where it says, "Copies of old maps and look  
5 at the numbers from 10 years ago," do you see that  
6 task?

7 A. I do.

8 Q. And do you know what those old maps and those  
9 numbers from 10 years ago refer to?

10 A. My sense, it would have referred to the existing  
11 districts.

12 Q. Okay. And when you say existing districts, do you  
13 mean House districts, Senate, Congressional, school  
14 districts? Do you have a sense of which type of  
15 district you were talking about here?

16 A. My sense would have been whatever districts we were  
17 considering from there. That would be my sense from  
18 that particular time.

19 Q. Okay. So, and maybe I should have asked this to  
20 clarify at the beginning. But the Redistricting --  
21 I'm sorry -- the Reapportionment Committee, did it  
22 mainly deal with statewide districts or local  
23 redistricting, such as school boards and  
24 municipalities?

25 A. It was primarily process-driven, and so it would

1 have dealt with them all at some level, but it was  
2 at a fairly high level, not (indiscernible).

3 Q. Okay. So, this could refer to any of those  
4 districts I mentioned; it's not specific to House,  
5 Senate, Congress, or local redistricting; is that  
6 correct?

7 A. That is correct, yes.

8 Q. Okay. So you mentioned a minute ago that it was  
9 your practice or your regular habit to state that  
10 these were nonpartisan meetings; is that accurate?

11 A. Yeah. It should be reflected in the minutes on some  
12 of the meetings when I chaired, yes.

13 Q. Okay. Yeah, and I think we looked at one where that  
14 was stated at the beginning. I want to look at this  
15 last point that says -- well, let's go to the second  
16 to last. "Look at districts that did grow and may  
17 be able to shed some population to adjacent  
18 districts." Can you explain what that task means?

19 A. The redistricting, of course, everything has to be  
20 within a certain tolerance, and so that would be a  
21 function to look at where things had to be redrawn,  
22 so what's gonna happen there.

23 Q. Okay. And when you say tolerance, can you explain  
24 that term a little bit more?

25 A. For example, if the variance could only be ten